

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

In re:
MARK G. HENKE
and CHERYL E. HENKE,
Debtors.

Chapter 13
Case No. 14-34221-SVK

STIPULATION ON MOTION FOR RELIEF FROM AUTOMATIC STAY AND
ABANDONMENT OF SETERUS, INC., AS THE AUTHORIZED SUBSERVICER
FOR FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE"),
A CORPORATION ORGANIZED AND EXISTING UNDER THE LAWS OF
THE UNITED STATES OF AMERICA
RE: PROPERTY LOCATED AT:
2460 Magna Vista, Jackson, Wisconsin 53037

Whereas, Debtors having filed an objection to the Motion for Relief from Automatic Stay and Abandonment of Seterus, Inc., as the authorized servicer for Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing under the laws of the United States of America ("Movant"); and,

Whereas, the parties having arrived at an agreement resolving the post-petition default set forth in the Motion;

Now, Therefore, It Is Hereby Stipulated and Agreed as follows:

TERMS:

1. That Movant may file a supplemental claim in the amount of \$9,026.30 for the

Drafted by:

O'Dess and Associates, S.C.
1414 Underwood Avenue, Suite 403
Wauwatosa, Wisconsin 53213
(414) 727-1591
(414) 727-1590 fax

post-petition arrearage consisting of monthly mortgage payments due June 1, 2015, through October 1, 2015, at \$1,894.63, each, or \$9,473.15, total; less suspense fund of \$1,272.85; plus, \$650.00 for attorneys' fees and \$176.00 for costs for the Motion for Relief. The Standing Trustee is authorized and directed to pay from funds of the estate a supplemental claim filed pursuant to an Order on this Stipulation.

2. That Movant is relieved of its duty pursuant to Rule 3002 to file and serve a notice

of post-petition fees, expenses and charges included in this Stipulation.

3. That commencing with the November 1, 2015 payment, Debtors shall resume making regular post-petition mortgage payments directly to Movant when due. Until further notice, the monthly payment is \$1,894.63 and monthly payments shall be sent exclusively to: Seterus, Inc., P.O. Box 1047, Hartford, CT 06143.

4. That Movant is granted a doomsday provision on all heretofore tendered payments and on all payments from November 1, 2015, through April 1, 2016. That, if any previously tendered payments return insufficient funds or if Debtors for any reason fail to timely make any payment due beginning November 1, 2015, through April 1, 2016, upon the filing of a statement of default with notice to Debtors and counsel for Debtors, Movant shall be entitled to an order granting the relief requested in the original motion, including relief from automatic stay and abandonment.

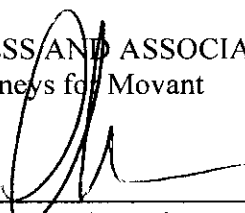
5. That in the event Debtors fail to timely make any payment to Movant or breach
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any of the remaining terms and conditions of the note and mortgage, Movant may renew its Motion for Relief from Automatic Stay and Abandonment for the remainder of this case by letter request to the Court and without the need to pay an additional filing fee.

Dated this 16th day of November, 2015.

O'DESS AND ASSOCIATES, S.C.
Attorneys for Movant


By: D. Alexander Martin
State Bar ID No. 1046591


Dated this _____ day of _____, 2015.

GERACI LAW, LLC
Attorneys for Debtor

By: Andrew M. Golanowski
State Bar ID No. 1055499

Dated this 9th day of November, 2015.

NO OBJECTION:


Mary B. Grossman, State Bar ID No. 1030684
Robert W. Stack, State Bar ID No. 1033733
Sandra M. Baner, State ID No. 1018992
Christopher Schimke
Office of Chapter 13 Standing Trustee

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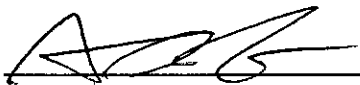
Dated this _____ day of _____, 2015.

O'DESS AND ASSOCIATES, S.C.
Attorneys for Movant

By: _____
D. Alexander Martin
State Bar ID No. 1046591

Dated this 4 day of March, 2015.

GERACI LAW, LLC
Attorneys for Debtor


By: _____
Andrew M. Golanowski
State Bar ID No. 1055499

Dated this _____ day of _____, 2015.

NO OBJECTION:

Mary B. Grossman, State Bar ID No. 1030684
Robert W. Stack, State Bar ID No. 1033733
Sandra M. Baner, State ID No. 1018992
Christopher Schimke
Office of Chapter 13 Standing Trustee